

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

**SCOT CARLEY, on behalf of Himself and
All Others Similarly Situated,**

Plaintiff,

VERSUS

**CREST PUMPING TECHNOLOGIES,
LLC**

Defendant.

NO. MO:15-CV-00161-RAJ-DC

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT
FOR MOTION FOR SUMMARY JUDGMENT
ON CLAIM OF PLAINTIFF, SCOT CARLEY**

NOW INTO COURT, through undersigned counsel, comes Defendant, Crest Pumping Technologies, LLC (“Crest”), who respectfully moves this Court pursuant to Local Rule CV-7(b) for leave to exceed the page limit for Crest’s dispositive motion from twenty (20) pages, as permitted by Local Rule CV-7(d)(3) and this Court’s Orders dated February 19, 2016 (Rec. Doc. 18) and April 21, 2016 (Rec. Doc. 28), not to exceed twenty-eight (28) pages, exclusive of the caption, signature block, any certificate, and appendix containing accompanying documents for the good cause shown herein:

1. Local Rule CV-7(b) states that motions shall be limited to 20 pages in length, unless otherwise authorized by the Court.
2. Crest seeks leave to exceed the 20 page limitation for its dispositive motion on the claim asserted by Plaintiff, Scot Carley, and good cause exists for Crest to do so.
3. In the motion, Crest includes both its undisputed statement of material facts and legal authorities to support the relief requested by Crest and to aid the Court.

4. Moreover, Crest submits that its motion is succinct, but given that it addresses three defenses to the claim asserted by Carley, additional pages are needed to adequately set forth both the undisputed material facts and the law.

5. Carley does not oppose the relief sought by this motion.

WHEREFORE, Crest respectfully requests the Court grant leave for it to exceed the page limit for its dispositive motion not to exceed twenty-eight (28) pages.

Respectfully submitted,

/s/ Jennifer L. Anderson

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***Attorneys for Defendant, Crest Pumping
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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2016, a copy of the foregoing was filed electronically using the Court's CM/ECF system and served in accordance with the Federal Rules of Civil Procedure. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing.

/s/ Jennifer L. Anderson

Jennifer L. Anderson